

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
APEX LINEN SERVICE LLC, <i>et al.</i> , ¹)	Case No. 20-11774 (LSS)
)	
Debtors.)	(Jointly Administered)
)	
)	Related to Docket No. 132

**CERTIFICATION OF COUNSEL WITH RESPECT TO ORDER (I) APPROVING BID AND
SALE PROCEDURES, (II) APPROVING CERTAIN BIDDING PROTECTIONS,
(III) APPROVING THE FORM AND MANNER OF NOTICE OF THE SALE AND
ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS AND UNEXPIRED
LEASES, AND (IV) SCHEDULING AN AUCTION AND SALE HEARING**

Undersigned counsel for the Apex Linen Service LLC, *et al.* (the “Debtors”) hereby certifies as follows:

1. On August 6, 2020, the Debtors filed their *Emergency Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief* [Docket No. 132] (the “Motion”).
2. On August 24, 2020, the Court held a hearing (the “Hearing”) on the Motion and the Debtors’ request for an order approving bidding procedures, and ruled on certain language to be included in the proposed order.
3. Subsequent to the August 24, 2020 hearing, the Debtors, Committee and Lenders have negotiated the terms of a revised proposed *Order (I) Approving Bid and Sale Procedures*,

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable are: Apex Linen Service LLC (9075), Highland Apex Holdings LLC (0537), Highland Avenue Capital Partners LLC (2825), Highland Apex GP LLC (9246), and Highland Apex Management LLC (5476). The location of the Debtors’ corporate headquarters, and the business address for Apex Linen Service LLC is 6375 S. Arville Street, Las Vegas, NV 89118. The business address for all other Debtors is 205 Pier Avenue, Suite 102, Hermosa Beach, CA 90254.

(II) Approving Certain Bidding Protections, (III) Approving the Form and Manner of Notice of the Sale and Assumption and Assignment of Executory Contracts and Unexpired Leases, and (IV) Scheduling an Auction and Sale Hearing (the “*Bidding Procedures Order*”), a copy of which is attached hereto as Exhibit A.

4. Attached hereto as Exhibit B is a redline of the Bidding Procedures Order to the proposed order originally attached to the Motion.

5. Subject to the Court’s calendar and availability, the Parties request that the sale hearing be changed to October 15, 2020.

WHEREFORE, the Debtors respectfully request that the Court enter the proposed Bidding Procedures Order at its earliest convenience.

Dated: September 22, 2020

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